



CITY OF EUREKA
PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146 • Fax 707-441-4202
Administration: 707-441-4203 • Engineering: 707-441-4194
Building: 707-441-4155 • Utility Operations: 707-441-4364
publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

July 9, 2018

Certified # 7012 3050 0002 2218 4809

Ms. Barbara Groom
Lost Coast Brewery
1600 Sunset Dr.
Eureka, CA 95503

RE: NOTICE OF VIOLATIONS

Dear Ms. Groom:

In May 2018, the City of Eureka issued two separate Notices of Violation (NOV) to Lost Coast Brewery. The first was issued due to the discharge of effluent below the acceptable pH range and failure to maintain pretreatment equipment in proper working order. The second NOV was issued in response to a large volume of solids released to the sanitary sewer. The solids were released while staff was attempting to meet pH limits and continue operations with the pH neutralization system in substandard condition.

The response to the first NOV stated that tanks 1, 2, and 3 had new pH probes installed and calibrated. Verbal discussion revealed that the third was still in the process of being brought into operation and it was communicated that this would also be completed. It was expressed by Lost Coast Brewery staff that the automatic chemical feed was brought back on line and that when necessary supplemental manual adjustment would occur to maintain compliant pH levels. The discharge of effluent containing pH lower than 5 std. units is a nationally prohibited discharge standard set forth in the Code of Federal Regulations. Lost Coast Brewery shall maintain its equipment as to not violate this standard or fines may be issued and more stringent limits enacted in the future.

The response to the second NOV dated June 4, 2018, indicated that accumulated solids would be removed from tanks 2 and 3 within 30 days and staff would perform quarterly inspections and bi-annual removal of accumulated solids. Follow-up statements indicated that the solids would also be removed from tank 1 when a break in production allowed. A statement was made that the bottom valves on tanks 2 and 3 would never be opened in a manner that will bypass tank 3 and send wastewater from these tanks directly to the City of Eureka sanitary sewer.

Based on the nature of the violations and the above mentioned responses, Lost Coast Brewery is issued the following Requirements and Recommendations:

Engineering

Construction
Development
Transportation
Stormwater

Field Operations

Water Distribution
Wastewater Collection
Equipment Operations

Building

Construction Regulation
Code Enforcement

Utility Operations

Water and Wastewater Treatment
Source Control

REQUIREMENTS

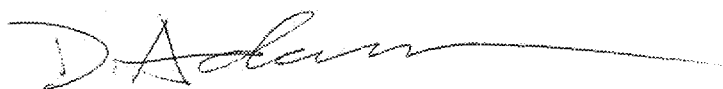
- 1) Lost Coast Brewery shall maintain at least two properly working and calibrated pH probes in its neutralization system at all times. In the event that Lost Coast Brewery cannot meet this requirement, Lost Coast Brewery shall notify the City of Eureka Source Control office within 48 hours of discovery of the deficiency.
- 2) All maintenance of the pH probes, automatic chemical feed, and pH neutralization system shall be documented and records produced upon inspection. This includes but is not limited to inspections, calibration of the probes, calibration checks with laboratory pH equipment, and manual adjustment through the addition of sodium bicarbonate. The documentation shall include at a minimum the date, time, person performing the action, action performed, and numerical recordings of the pH observed.
- 3) Receipts or manifests from the pumping of solids from the bottoms of the neutralization tanks shall be sent to sourcecontrol@ci.eureka.ca.gov. A description of the process used to ensure that all solids were removed will also be provided. Lost Coast Brewery will provide a timeframe for completing the solids removal from tank 1 not to exceed 90 days from receipt of this follow-up letter. Lost Coast Brewery will provide a description of the process by which quarterly inspections are performed. All information from requirement 3 shall be received no later than August 1, 2018.

RECOMMENDATIONS

- 1) Lost Coast Brewery's NOV response dated June 4, 2018 indicated that a "Long-term correction of the system will be installing a solids separator pre neutralization system." It is recommended that Lost Coast Brewery explore this option to prevent the build-up of solids in the pH neutralization system, help clarify the discharge to the City of Eureka sanitary sewer, and prevent future violations.

Your cooperation in resolving these matters is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the requirements and recommendations herein.

Sincerely,



David Adams
Source Control Inspector II

received (hand delivered)
5-30-18
DA

May 30, 2018

David Adams
City of Eureka
4301 Hilfiker Ln.
Eureka, CA 95503

Enclosed is a formal response to the notice of violation dated May 16, 2018

Dear Mr. Adams

On 5/10/18 Lost Coast Brewery was in violation of EMC Section 50.020(B)(2) due to a pH reading of 4.8 std. units collected at Outfall 001.

The reason for the discharge violation was due to malfunctioning pH probes and a lack of wastewater treatment.

Corrective action has been taken to comply with rules and regulations pertaining to wastewater discharge permit number 133 as of 5/30/18.

Tanks 1, 2 and ~~3~~ have had new pH probes installed and calibrated.

Chemical dosing pumps for both tanks 1 and 2 have been inspected and serviced to insure proper supply of chemicals for the pretreatment process.

Documentation of the wastewater system has been greatly increased and will be available upon request.

Sincerely,

Lost Coast Brewery

Eric stated that probe in tank 3 will also be installed.

June 4, 2018

Dave Adams
City of Eureka
4301 Hilfiker Ln.
Eureka, CA 95503

received
6-5-18
JA

Enclosed is a formal response to the notice of violation dated May 29, 2018

Dear Mr. Adams

On May 17, 2018 City staff observed excessive solids being discharged into the sanitary sewer from brewery operations.

The opening of tank 2's bottom valve and allowing wastewater to bypass tank 3 was the direct cause of solids being released into the city of Eureka's sanitary sewer system.

Upon routine inspection of the breweries wastewater pH levels, it was discovered that tank 3's pH had dropped to an unacceptable value. In an attempt to gain capacity to allow tank 3's pH to be manually adjusted and after verifying that tank 2 had an acceptable pH reading. The bottom valve on tank 2 was opened allowing wastewater to bypass tank 3. Given that there is constant aeration applied to tank 2, it was assumed that an accumulation of solids would not be an issue.

Immediate corrective actions will be taking place within the next 30 days and will consist of removing accumulated solids from tanks 2 and 3. Followed by quarterly inspections and bi-annual removal of accumulated solids.

Long-term correction of the system will be installing a solids separator pre neutralization system. Followed by periodic inspection of accumulation of solids in Tanks 1, 2 and 3.

Bottom valves on tanks 1 and 2 will never be opened in a way that will send wastewater to the city of Eureka's sanitary sewer.

Sincerely,

Lost Coast Brewery



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*Hand Delivered
5/30/18
7:35 pm*

May 29, 2018

Ms. Barbara Groom
Lost Coast Brewery
1600 Sunset Drive
Eureka, CA 95503

RE: NOTICE OF VIOLATION

Dear Ms. Groom:

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit No. 133. Please be advised that to avoid administrative penalties including, but not limited to fines, you must fully comply with all terms stated in the Notice.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Sincerely,

David Adams
Source Control Inspector II

Cc: Michael Hansen-Deputy Director of Public Works Utility Operations

Engineering
Construction
Development
Transportation
Stormwater

Field Operations
Water Distribution
Wastewater Collection
Equipment Operations

Building
Construction Regulation
Code Enforcement

Utility Operations
Water and Wastewater Treatment
Source Control

LOST COAST BREWERY NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the City's Municipal Code, and the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

1. The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Lost Coast Brewery, and other industrial users, and has implemented a pretreatment program to control such discharges.
2. Under this pretreatment program Lost Coast Brewery was issued Wastewater Discharge Permit Number 133 on October 19, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
3. Pursuant to the EMC and the above-referenced permit, data on the compliance status of Lost Coast Brewery is collected by the City of Eureka.
4. On May 17, 2018, City staff observed excessive solids being discharged into the sanitary sewer from brewery operations. Through discussion with brewery staff, it was determined that the bottom valve on the second tank in the pH neutralization system had been opened bypassing the third tank in the series in an attempt to balance pH in a non-routine manner.
5. The pH balance tanks receive brewery wastewater that contains residual solids not separated in the other side-streaming processes. While the primary purpose of the tanks is to neutralize pH they also serve as settling tanks for residual solids. Part 3(B)(12) of Wastewater Discharge Permit 133 prohibits the discharge of "sludge, screenings, or other residues from the pretreatment of industrial wastes including but not limited to spent grains, or yeast."
6. Part 6(D) of Wastewater Discharge permit 133 addresses specific requirements regarding bypass of pretreatment equipment:

D. Bypass Notification

1. Bypass Definition

Bypass means the intentional diversion of waste streams from any portion of the permittees treatment facility. Bypass is prohibited, and the City may take enforcement action against the permittee for a bypass, unless;

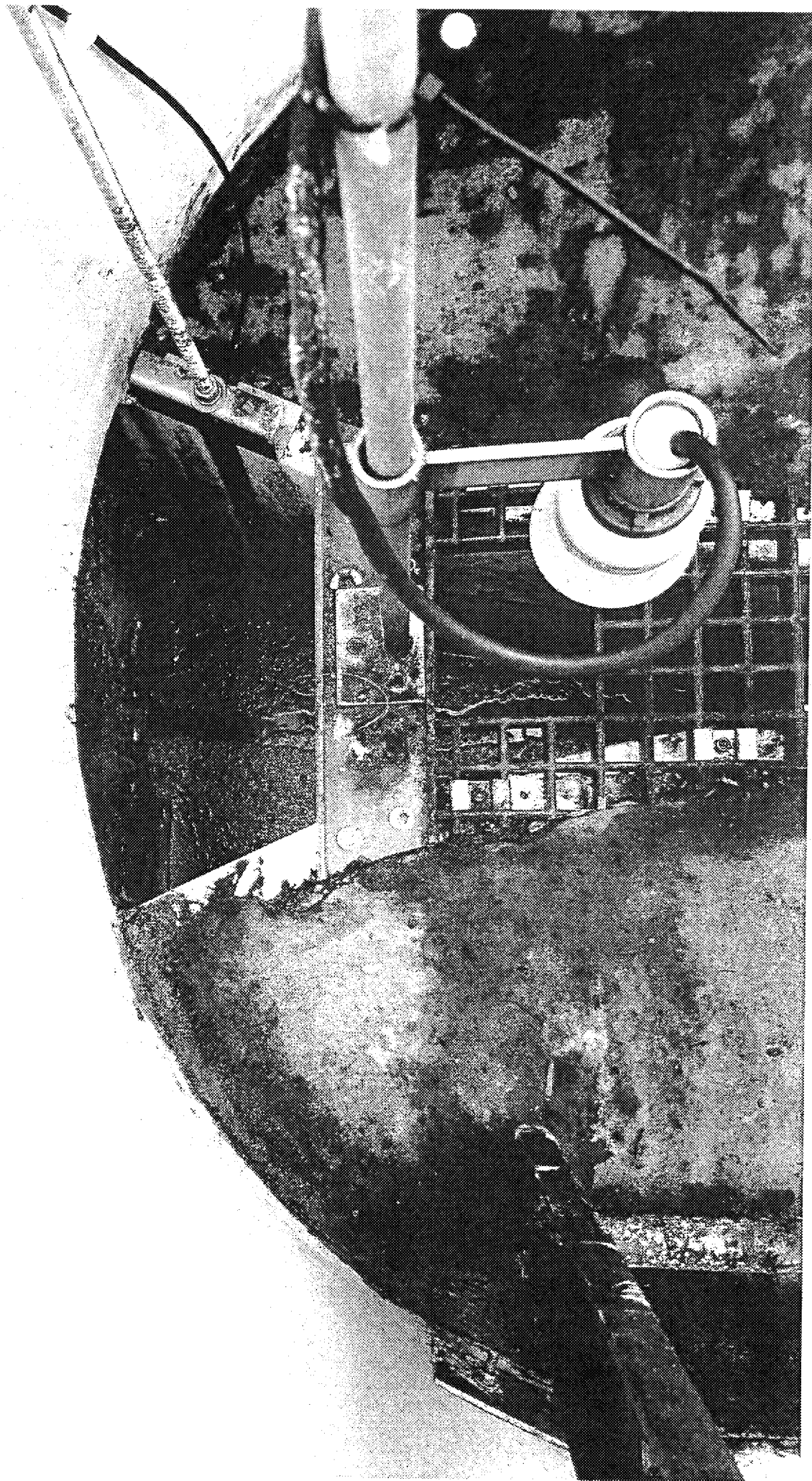
- a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime, and the permittee submitted notices as required under of this section. (This condition is not satisfied if adequate back up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance.)

- c. The permittee may allow any bypass to occur which does not cause Pretreatment Standards or Requirements to be violated, but only if it also is for essential maintenance to assure efficient operation, and the permittee submitted notice as required under this section.
2. When and How to Notify the City
 - a. Planned Bypass
If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the City of Eureka, at least ten days before the date of the bypass.
 - b. Unplanned Bypass
The permittee shall submit oral notice of an unanticipated bypass to the City of Eureka within 24 hours from the time the permittee becomes aware of the bypass. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the bypass.

LOST COAST BREWERY IS HEREBY NOTIFIED THAT:

1. It is in violation of Wastewater Discharge Permit Number 133 and the Sewer Use Ordinance of the City of Eureka.
2. It is required to provide this office in writing within seven (7) working days of receipt of this Notice of a confirmation of the reason for the wastewater discharge violation, the action to be taken to correct the non-compliance violation, and the date the corrective action has been or will be implemented. The corrective action must address the removal of solids prior to introduction into the pH neutralization system or the management and removal of the residual solids in a manner which prevents accumulation to a problematic level and discharge to the sanitary sewer. The response must also provide a statement that the valves located at the bottom of tanks one and two shall never be opened in a manner which allows bypass to the sanitary sewer.
3. Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Lost Coast Brewery to administrative penalties including but not limited to fines.
4. This notice is effective upon receipt by Lost Coast Brewery.
5. Correspondence regarding this notice shall be sent to:

David Adams
Source Control Inspector II
City of Eureka
4301 Hilfiger Ln.
Eureka, CA 95503





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publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

May 16, 2018

Certified #7012 3050 0002 2218 4748

Ms. Barbara Groom
Lost Coast Brewery
1600 Sunset Dr.
Eureka, CA 95503

RE: NOTICE OF VIOLATION

Dear Ms. Groom:

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit No. 133. Please be advised that to avoid administrative penalties including, but not limited to fines, you must fully comply with all terms stated in the Notice.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Sincerely,

David Adams
Source Control Inspector II

Engineering

Construction
Development
Transportation
Stormwater

Field Operations

Water Distribution
Wastewater Collection
Equipment Operations

Building

Construction Regulation
Code Enforcement

Utility Operations

Water and Wastewater Treatment
Source Control

LOST COAST BREWERY **NOTICE OF VIOLATION**

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the City's Municipal Code, and the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

1. The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Lost Coast Brewery, and other industrial users, and has implemented a pretreatment program to control such discharges.
2. Under this pretreatment program Lost Coast Brewery was issued Wastewater Discharge Permit Number 133 on October 19, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
3. Pursuant to the EMC and the above-referenced permit, data on the compliance status of Lost Coast Brewery is collected by the City of Eureka.
4. This data shows that Lost Coast Brewery has violated EMC Section 50.020(B)(2) and Wastewater Discharge Permit Number 133 in the following manner:

Sample Location	Parameter	Date of Sample Collection	Analytical Results	Discharge Limit
Outfall 001	pH	5-10-18	4.8 std. units	5.0-12.5 std. units

5. A follow-up inspection conducted 5-10-18 showed that the pH neutralization system was not being properly maintained. None of the pH probes which control the pH neutralizing system were properly calibrated and in working order. Maintenance of the system is not being properly documented.

Part 1-Standard requirements of Permit 133 states the following:

- A. The permittee shall maintain all pretreatment equipment in proper working condition per manufacturer's specifications.
- B. Maintenance on the pretreatment equipment shall be documented and records retained for at least three years.

LOST COAST BREWERY IS HEREBY NOTIFIED THAT:

1. It is in violation of Wastewater Discharge Permit Number 133 and the Sewer Use Ordinance of the City of Eureka.
2. It is required to notify this office in writing within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation, the action to be taken to correct the non-compliance violation, and the date the corrective action has been or will be implemented.

4. Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Lost Coast Brewery to administrative penalties including but not limited to fines.
5. This notice is effective upon receipt by Lost Coast Brewery.
6. Correspondence regarding this notice shall be sent to:

David Adams
Source Control Inspector
City of Eureka
4301 Hilfiker Ln.
Eureka, CA 95503

Mr. Felperin:

As requested per your office I am responding to the violation notice Lost Coast Brewery received on December 15th 2015. The findings our facility found of the flow limit violations were due to a employee opening a valve thinking it would help flush the pipe out. The findings of the pH limit violations unfortunately have been inconclusive. We have calibrated our pH probes and have found them to be accurate.

Resolutions are listed as follows:

A) Flow limit:

Install a non adjustable ball valve at the outfall of our waste water treatment. Project complete January 15th 2016. Lost Coast Brewery requests the City of Eureka to confirm flow at 260 GPM.

B) pH Limit:

Install automated recirculation system to LCB waste water equipment. Project to be completed by January 30th 2016.

Any question please contact me at 707- 362 -4737

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Campbell', is positioned above the printed name.

Eric Campbell
Production Manager
Lost Coast Brewery



CITY OF EUREKA

PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146

December 15, 2015

Certified Mail # 7008-1830-0004-8828-7871

Ms. Barbara Groom
Lost Coast Brewery
1600 Sunset Dr.,
Eureka, CA 95501

RE: NOTICE OF VIOLATION

Dear Ms. Groom:

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit No. 133. Please be advised that to avoid administrative penalties including, but not limited to fines, you must fully comply with all terms stated in the Notice.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Sincerely,

Marty Felperin
Source Control Inspector

Cc: Mr. Dan Duncan, Utilities Operations Manager, City of Eureka

UTILITIES OPERATIONS DIVISION

Wastewater Treatment
Water Treatment
FAX - Wastewater Treatment

(707) 441-4364
(707) 441-4234
(707) 441-4366

Pretreatment
Water Quality Laboratory
FAX - Water Treatment

(707) 441-4362
(707) 441-4363
(707) 441-4265

LOST COAST BREWERY - NOTICE OF VIOLATION

12/15/15

LEGAL AUTHORITY:

The following Findings are made an Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS:

1. Lost Coast Brewery discharges non-domestic wastewater containing pollutants into the sanitary sewer system of the City of Eureka. The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Lost Coast Brewery, and other industrial users, and has implemented a pretreatment program to control such discharges.
2. Lost Coast Brewery is a "significant industrial user" as defined by Section 50.002 of the EMC.
3. Lost Coast Brewery was issued Wastewater Discharge Permit No. 133 on October 19, 2014 that contains prohibitions, restrictions, and limitations related to the discharge of wastewater to the sanitary sewer. Among these limitations was a 270 gallon per minute (g.p.m.) flow rate limit, and the limited pH range of 5.0 to 12.5 std. units per EMC Section 50.020.
4. Pursuant to the EMC and the above-referenced permit, data on the compliance status of Lost Coast Brewery is collected by the City of Eureka. Based on analysis of the data it was determined that Lost Coast Brewery had violated the 270 g.p.m. flow limit specified in Part (2) (C), and the pH limit specified in Part 5 (B) of Wastewater Discharge Permit No. 133. (See supplemental information).

LOST COAST BREWERY IS HEREBY NOTIFIED THAT:

1. It is in violation of Wastewater Discharge Permit Number 133 and the Sewer Use Ordinance of the City of Eureka.
2. It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation, the action to be taken to correct the non-compliance violation, and the date the corrective action has been or will be implemented.
3. Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Lost Coast Brewery to administrative penalties including but not limited to fines.

LOST COAST BREWERY - NOTICE OF VIOLATION

12/15/15

4. This notice is effective upon receipt by Lost Coast Brewery.
5. Correspondence regarding this notice shall be sent to:

Marty Felperin
Source Control Inspector
City of Eureka
4301 Hillfiker Ln.
Eureka, CA 95503

SUPPLEMENTAL INFORMATION

A) Flow Limit Violations

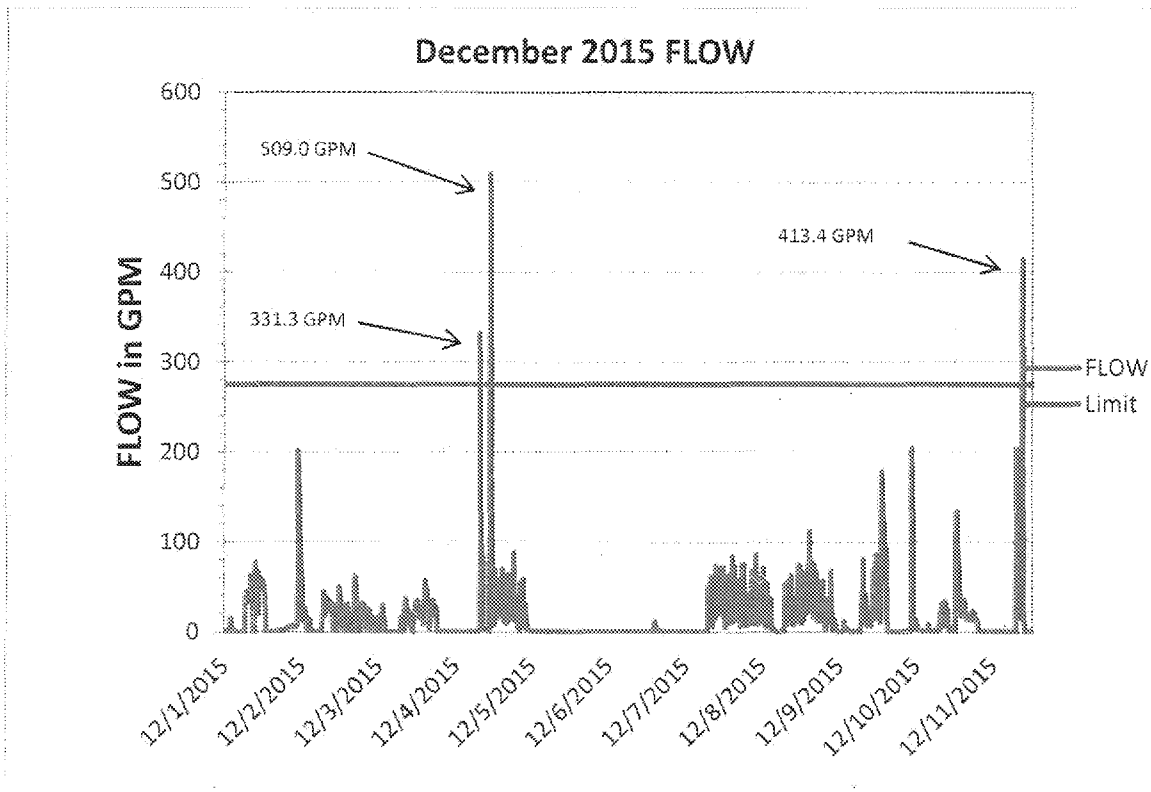


Figure 1: An express visual of FLOW limit violations occurring at Lost Coast Brewery from December 1, 2015 to December 11, 2015. Data reviewed, archived, and transcribed from HACH SC200 Controller device.

Date	Time	Flow in G.P.M.
12/04/2015	07:40:00	331.320404
12/04/2015	10:50:00	509.046082
12/11/2015	09:00:00	413.398834

LOST COAST BREWERY - NOTICE OF VIOLATION

12/15/15

B) pH Limit Violations

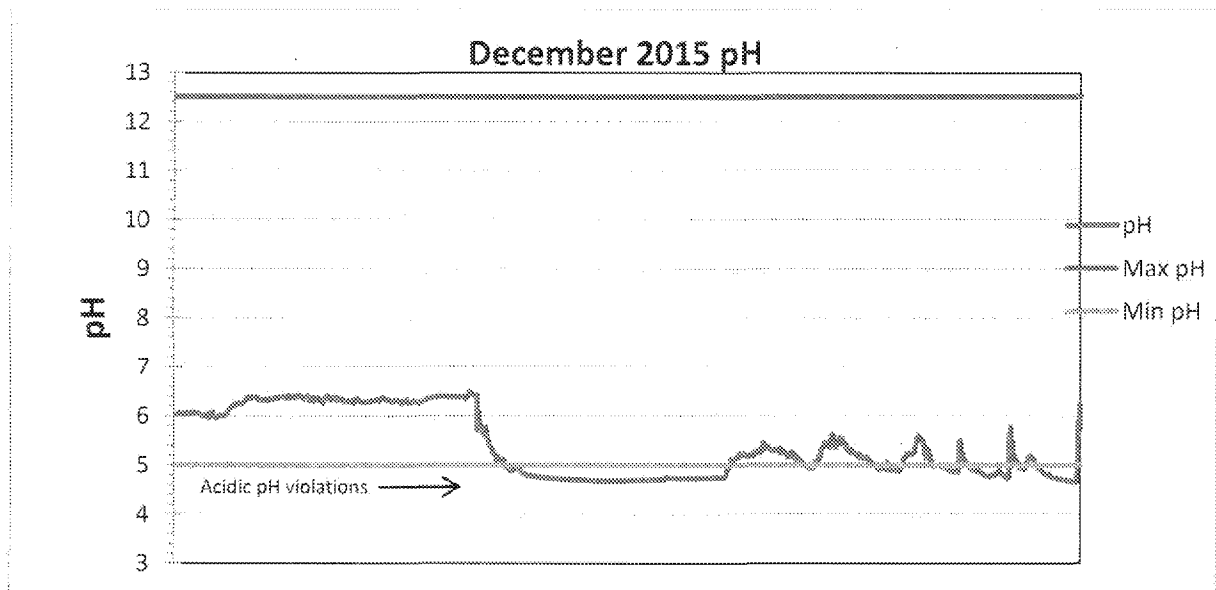


Figure 2: pH limit violations occurring at Lost Coast Brewery from December 1, 2015 to December 11, 2015. pH readings are taken continuously by an ion specific electrode manifold fitted into the Lost Coast Brewery partial flume located on Sunset Dr. Eureka, CA. Data reviewed, archived, and transcribed from HACH SC200 Controller device.

C) Referenced

- 1) City of Eureka Municipal Code Title 5, Chapter 50, Sewers
- 2) HACH SC200 Controller Manual, 01/2014, Edition 7.